

REMARKS

Claims 1 - 18 are pending in the present application. Reconsideration and allowance in view of the following remarks is respectfully requested.

As To The Merits:

As to the merits of this case, the Examiner maintains the following rejections:

- 1) claims 1, 4, 5, 11, 12, 13 and 16–18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ebert (U.S. Patent No. 6,278,991);
- 2) claims 2, 6, 10 and 14 stand rejected under 35 U.S.C. §103(a) as being unptentable over Ebert in view of Downs et al. (U.S. Patent No. 6,070,176); and
- 3) claims 3, 7, 8, 9 and 15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ebert in view of Rosin et al. (U.S. Patent No. 6,295,057).

Each of these rejections is respectfully traversed.

Independent claim 1 calls for *link setting means for setting, on the basis of said acquired position information, a link between an m-th object and an n-th object when only said n-th object exists in a predetermined direction with reference to said m-th object, said link setting means alternatively setting a link based on a distance of each object from said m-th object in said predetermined direction when a plurality of objects exist in said predetermined direction with reference to said m-th object.*

Similarly, independent claims 11, 16 and 18 each call for *first processing for setting a link between an m-th object and an n-th object when only said n-th object exists in a predetermined direction with reference to said m-th object; and second processing for setting a link based on a distance of each object existing in a predetermined direction from said m-th*

object when a plurality of objects exist in said predetermined direction with reference to said m-th object.

It is respectfully submitted that the Examiner has failed to properly address or provide any rebuttal regarding Applicant's position, set forth in the Amendment filed April 7, 2004, that Ebert fails to disclose or fairly suggest the features of the claimed invention concerning *setting a link based on a distance of each object existing in a predetermined direction from said m-th object when a plurality of objects exist in said predetermined direction with reference to said m-th object.*

Instead, according to Ebert "a link is created between a cluster object link, such as cluster object link 60, and one or more object links, such as object links 70, 72, 74, by using a mouse to drag the graphical representations of object links 70, 72, 74 to the graphical representation of cluster object link 60."¹

That is, Ebert is not concerned at all with setting a link based on the distance of each object existing in a predetermined direction from a m-th object when a plurality of objects exist in the predetermined direction with reference to the m-th object, since instead Ebert creates a link by merely dragging the graphical representation of an object link to the graphical representation of the cluster object link.

¹ Please see, lines 32 - 37, column 9 of Ebert.

Response under 37 C.F.R. §1.114
Attorney Docket No. 011002
Serial No. 09/923,543

In view of the aforementioned remarks, Applicant submits that the claims, as herein amended, are in condition for allowance. Applicant requests such action at an early date.

If the Examiner believes that this application is not now in condition for allowance, the Examiner is requested to contact the undersigned attorney at the telephone number indicated below to arrange for an interview to expedite the disposition of this case.

In the event that this paper is not timely filed, Applicant respectfully petitions for an appropriate extension of time. Please charge any fees for such an extension of time and any other fees that may be due with respect to this paper to Deposit Account No. 50-2866.

Respectfully Submitted,

WESTERMAN, HATTORI, DANIELS & ADRIAN, LLP



Thomas E. Brown
Attorney for Applicant
Registration No.: 44,450

TEB:jli

1250 Connecticut Avenue
Suite 700
Washington, D.C. 20036
(202) 822-1100